

Exhibit 1

STATE OF WISCONSIN CIRCUIT COURT BROWN COUNTY
BRANCH 5

AUTHENTICATED COPY
FILED

MAR 28 2022

CLERK OF COURTS
BROWN COUNTY, WI

Willy Michel
P.O. Box 562
Green Bay WI 54305,

Plaintiff

v.

American Family Insurance
American Parkway
Madison, WI 53783,

Defendant

Case No

22cv364

Case classification:

Intentional Tort

Case code :30106

SUMMONS

THE STATE OF WISCONSIN

To each person named above as a defendant:

You are hereby notified that the plaintiff named above has filed a lawsuit or other legal action against you. The complaint, which is attached, states the nature and basis of the legal action.

Within 20 days after receiving this summons, you must respond with a written answer, as that term is used in Wis. Stat. ch. 802, to the complaint. The court may reject or disregard an answer that does not follow the requirements of the statutes. The answer must be sent or delivered to the court, whose address is 100 S. Jefferson St. Green Bay, WI 54301, and to plaintiff whose address is P.O. Box 562, Green Bay, WI 54305 You may have an attorney help or represent you.

If you do not provide a proper answer within 20 days, the court may grant judgment against you for the award of money or other legal action requested in the complaint, and you may lose your right to object to anything that is or may be incorrect in the complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future and also may be enforced by garnishment or seizure of property.

Dated: 03/25/2022

Willy Michel
Pro Se

Electronically signed, Willy Michel

A handwritten signature in black ink, appearing to be 'Willy Michel', written in a cursive style.

P.O. 562, Green Bay, WI 54305
920-321-4487
Willy.Michel@aol.com

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Willy Michel
P.O. Box 562
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Case No. 22CV364

Plaintiff

v.

Case classification:
Intentional Tort
Case code :30106

American Family Insurance
6000 American Parkway
Madison, WI 53783

Amount claimed is greater
than (\$10,000),

Defendant

COMPLAINT

Plaintiff, **WILLY MICHEL** allege:

JURISDICTION

1. Plaintiff, **WILLY MICHEL** resides at 1803 Western Avenue, Green Bay, WI 54303.
2. Defendant, **AMERICAN FAMILY INSURANCE**, place of business, 3500 Parkland Dr. Depere, WI 54115
3. This Court has jurisdiction over the subject matter and the parties pursuant to Wis. Statutes 801.04 because defendant conducts business in this jurisdiction and Wis. Statutes 893.57 because plaintiff seeks damages for intentional tort.

STATEMENT OF FACTS

4. On or around May 2019. The defendant by actions of its agent and managers intentionally affixed next to my person a photo depicting a dress up monkey.

5. The photo of the dress up monkey came about after I complained to my supervisor Carrie Stetzer that some of her subordinates were harassing me, sabotaging my work, and forcing me to perform vain work.

6. Immediately after my complaint to Carrie Stetzer she retaliated and place me on an ongoing performance issue.

7. Furthermore, a co-worker name Mark Krieg (White Male) who sat next to me, on my right and Mark's desk is face-to-face with my supervisor Carrie Stetzer's desk, under the guise of discussing sports with me, Mr. Krieg engaged me in talking about playing Golf, where I mention to him although I am a basketball fan, I am willing to learn and play Golf, if he invites me to.

8. Less than two days after Mark Krieg address me regarding playing Golf with him, Mark came to work with a photo of a dress-up Monkey mimicking playing Golf, and conspicuously affix the photo up high at my line of sight.

9. The defendant by actions of its agents and managers provoked and harassed me, by calling my name, drawing my attention on the photo of the monkey, and continuously mocked and laughed at me when it appears that I am clearly distraught.

10. Moreover, Mark Krieg knowing that I like basketball and around the month of May is basketball playoff season and I chat about the playoff. Mr. Krieg came with a miniature basketball and affix next the monkey's foot and continuously calling my name and don't say a word but turning his head to the monkey and the basketball at its foot to draw my attention to it. During these instances my supervisor and other co-workers near my cubicle burst into laughter.

11. The defendant's agents and managers are fully aware of my nationality, that I am of Haitian origin; and my skin color is black. Purposely and maliciously seek to inflict the utmost mental anguish toward me.

12. On or around May 2019, I complained directly to my supervisor Carrie Stetzer in writing by way of a letter advising her that the photo was offensive toward me, and I am distraught, and she should ask Mr. Krieg to remove the photo.

13. Despite my complaint and plea to remove the photo. The photo remain as is, and the

harassment and laughter intensified. Carrie Stetzer never addresses my complaint in the letter, My complaint was met with silence, scorn and retaliation that I have a performance issue which ultimately give rise to my termination.

14. In defiance of my complaint Mark Krieg came with an additional wooden statue depicting an almost naked indigenous African man and place on his desk next to the photo of the monkey.

CLAIM FOR RELIEF

15. Due to my exposure to the photo and the continuous harassment, laughter, jeers, and mockery toward me by principally Mark Krieg and My supervisor Carrie Stetzer, I suffer an acute emotional distress.

16. Since my exposure to the photos and the harassment that accompanied, I became constantly anxious and ashamed whenever, wherever anyone mention monkeys, whether it was on tv, radio or my family and friend talk about monkeys, I became anxious withdrawn and cannot think or act naturally. I became angry and restless.

17. The defendant further retaliated against me, when I complained of the harassment and place me on a fabricated ongoing performance issue, as a guise to find cause for my termination. This latest form of harassment aggravated my trauma and ultimately altered my self-confidence in my professionalism.

18. Furthermore, even after my ultimate wrongful termination, I kept having the recurring thought of the harassment which consist of laughter, derision, and the continuous attempts by several of the defendant's agents drawing my attention to the monkey's photo whenever I am at work. This recurring thought paralyzed me with fear whenever I joined any other type of social setting that I might unluckily face a similar experience. Thus, I became withdrawn to most type of social setting as much as I can.

WHEREFORE, plaintiffs demand judgment against defendants jointly and severally for:

1. For compensatory damages for Plaintiff's emotional pain and suffering, in an amount to be proven at trial.
2. For punitive damages in an amount to be determined at trial.
3. For such other and further relief as this court deems just and proper.

JURY DEMAND

Plaintiffs demand a trial by a jury of twelve.

Dated: 03/25/2022

Willy Michel
Pro Se

Electronically signed by Willy Michel

A handwritten signature in black ink, appearing to be 'Willy Michel', written over a horizontal line.

P.O. Box 562, Green Bay, WI 54305
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Willy.Michel@aol.com

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PRIORITY MAIL



FROM:

WILLY MICHEL
P.O. Box 562
Green Bay, WI 54305

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Company
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Suite 400
Madison, WI 53717

To schedule free
Package Pickup
scan the QR code



EXPECTED DELIVERY DAY: 03/31/22

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